

**Federal Defenders
OF NEW YORK, INC.**

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November 16, 2020

BY ECF

The Honorable Judge Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

**RE: United States v. Donald Williams
20 Cr. 489 (JMF)**

Honorable Judge Furman:

I write to request a 30-day extension to file pretrial motions in Mr. Donald Williams' case. Defense motions are currently due on Friday, November 20, 2020. The Government does not object to this request.

On September 3, 2020, Mr. Williams was presented in Magistrate Court on a criminal complaint. The defense reserved a bail application without prejudice and Mr. Williams was ordered detained. On September 15, 2020, the Government filed an indictment against Mr. Williams; the Court referred Mr. Williams' arraignment to Magistrate Court. Mr. Williams was arraigned by Magistrate Judge Robert W. Lehrburger on September 28, 2020.

On September 25, 2020, the Court ordered the Government to produce discovery to the defense within two weeks and set the following motions schedule: Defense motions due by Friday, November 20, 2020; response due by December 4, 2020; reply due by December 11, 2020. The Government then completed two discovery productions on September 25, 2020 and October 2, 2020. Based on a review of the discovery provided, on October 26, 2020, defense counsel sent a letter to the Government requesting additional outstanding discovery. On November 11, 2020, the Government responded to defense counsel's request and provided additional discovery. The following day, the defense provided the Government with a drive to send the supplemental discovery directly to Mr. Williams at Essex County Correctional Facility.

Accordingly, the defense respectfully requests a 30-day extension of the current November 20, 2020 motions deadline. This extension will enable the defense to review the additional

discovery turned over on November 11, 2020, discuss the discovery with Mr. Williams, and determine what motions, if any, defense counsel will file on Mr. Williams' behalf. The Government does not object to this request.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Marne Lenox

Marne Lenox
Assistant Federal Defender
(212) 417-8721

cc: Sarah Kushner, Assistant U.S. Attorney

Application GRANTED. Any defense motion shall be filed by December 21, 2020. In light of the holidays, any opposition shall be filed by January 8, 2020; and any reply shall be filed by January 15, 2020. In light of the adjournment, the pretrial conference is ADJOURNED to January 4, 2021, at 3:00 p.m. Counsel should confer about excluding time under the Speedy Trial Act and submit a proposed order to Chambers. The Clerk of Court is directed to terminate Doc. #15. SO ORDERED.

A handwritten signature in black ink, appearing to be "J. M. ...", is written over the date.

November 16, 2020